

United States District Court
Eastern District of Tennessee
At Chattanooga

Ecolab, Inc. and Nalco Company, LLC
d/b/a Nalco Water, an Ecolab
Company and/or Nalco Water

Plaintiffs

v.

Anthony Ridley,

Defendant.

No. 1:22-CV-00050

TRM-CHS

Anthony Ridley's Deposition Designations

Defendant, Anthony Ridley ("Ridley"), by and through his counsel, hereby submits the Deposition Designations in the attached **Exhibit 1** for Corey Demarco and David Garza that he intends to present at trial pursuant to the Court's Amended Scheduling Order [Doc. 362] and subsequent Order setting the final pretrial conference [Doc. 424].

Ridley reserves the right to submit additional deposition testimony or modify these designations based on the Court's ruling on any motions currently pending before the Court or any ruling at the final pretrial conference regarding the admissibility of certain exhibits and evidence.

Ridley also reserves the right to use portions of depositions of parties and other witnesses to the extent that such persons may become unavailable at trial

and does not waive the right to offer additional portions of deposition testimony for rebuttal or impeachment.

Respectfully Submitted:

Patrick, Beard, Schulman & Jacoway, P.C.

By: /s/ Lance W. Pope

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Certificate of Service

I certify that on April 1, 2024, this document has been served upon all the parties via the Court's ECF system.

By: /s/ Lance W. Pope